

NEM:AS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. §§ 924(c), 1951(a))

CEDRIC NELSON,

No. 24-MJ-329

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SARAH VAN FOSSEN, being duly sworn, deposes and states that she is a Special Agent with the Federal Bureau of Investigation duly appointed according to law and acting as such.

On or about April 14, 2024, within the Eastern District of New York and elsewhere, the defendant CEDRIC NELSON did knowingly and intentionally obstruct, delay, and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of United States currency and merchandise from a smoke shop located on Smith Street in Brooklyn, New York.

(Title 18, United States Code, Section 1951(a))

On or about April 14, 2024, within the Eastern District of New York and elsewhere, the defendant CEDRIC NELSON did knowingly and intentionally use and carry a firearm during and in relation to a crime of violence, to wit: the Hobbs Act robbery described

above in violation of 18 U.S.C. § 1951(a), and did knowingly and intentionally possess such firearm in furtherance of said crime of violence, which firearm was brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii))

The source of your deponent's information and the grounds for her belief are as follows:¹

1. I have been a Special Agent with the Federal Bureau of Investigation for over two years. As a member of the Joint Bank Robbery/Violent Crime Task Force, I have participated in numerous investigations of robberies and similar crimes. I am familiar with the facts and circumstances set forth below from my participation in the investigation as well as my review of the investigative file, surveillance camera footage, and reports of other law enforcement officers involved in the investigation.

2. On or about April 14, 2024, at approximately 8:28 p.m., a man, later identified as the defendant CEDRIC NELSON, entered "Lucky Smith" a smoke shop located at 151 Smith Street in Brooklyn (the "Smoke Shop"), which is located approximately two blocks from NELSON's home, wearing a black hooded sweatshirt with "Dynamic Sports" written on the arm, black shoes with a light-colored spot on the heels, and black pants, as depicted below in Figure 1.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.



Figure 1

3. After briefly walking around the store, NELSON left the store and lingered outside. Approximately two minutes later, at approximately 8:30 p.m., NELSON re-entered the store, brandished a black firearm, and demanded that the cashier open the register, as depicted below in Figures 2 and 3. NELSON stole approximately \$250 in cash and \$800 worth of merchandise. Security footage captured Nelson wearing a black hooded sweatshirt with "Dynamic Sports" written on the arm, black shoes with a light-colored spot on the heels, and black pants. NELSON carried a black messenger bag and a blue laundry-style bag, as depicted above in Figure 1 and below in Figure 4.



Figure 2



Figure 3



Figure 4

4. I believe the perpetrator to be the defendant CEDRIC NELSON because, among other reasons and as set forth in greater detail below, surveillance video captured NELSON (i) before the crime, leaving an apartment building in which NELSON currently resides, wearing clothing consistent with what NELSON was wearing as captured in the Smoke Shop's surveillance footage, and (ii) after the crime, returning to the apartment building in which NELSON resides, wearing clothing consistent with what NELSON was wearing as captured in the Smoke Shop's surveillance footage. Additionally, law enforcement executed a search warrant on NELSON's residence and discovered clothing consistent with what NELSON was wearing as captured in the Smoke Shop's surveillance footage.

Before the Robbery

5. On or about April 14, 2024, at approximately 8:20 p.m., the defendant CEDRIC NELSON was captured on video surveillance from his apartment building, leaving the

apartment building wearing a black hooded sweatshirt with “Dynamic Sports” written on the arm, black shoes with a light-colored spot on the heels, and black pants. NELSON’s apartment building is located approximately two blocks from the Smoke Shop.

After the Robbery

6. Within minutes of the robbery, at approximately 8:34 p.m., surveillance video from NELSON’s apartment building captured NELSON returning to the apartment building. NELSON was wearing a black hooded sweatshirt with “Dynamic Sports” written on the arm, black shoes with a light-colored spot on the heels, and black pants, and he was carrying a blue laundry-style bag that appeared to be filled.

Search Warrant

7. On April 25, 2024, the Honorable Robert M. Levy, United States Magistrate Judge, Eastern District of New York, authorized a search warrant for CEDRIC NELSON’s home, an apartment on the fourth floor in the apartment building previously described, under Docket Number 24-MC-1684 (the “Search Warrant”).

8. On April 26, 2024, law enforcement agents executed the Search Warrant on CEDRIC NELSON’s home and found, among other items, as depicted below in Figure 5, a black hooded sweatshirt with “Dynamic Sports” written on the arm, black shoes with a light-colored² spot on the heels, black pants, a black messenger bag, and a blue laundry bag, all of which are consistent with the clothing and bags that NELSON was wearing before, during, and after his armed robbery of the Smoke Shop.

² In the Search Warrant, the light-colored spot was described as “white.”



Figure 5

WHEREFORE, your deponent respectfully requests that the defendant CEDRIC NELSON be dealt with according to law.



SARAH VAN FOSSEN
Special Agent
Federal Bureau of Investigation

Sworn to before me this
26th day of April, 2024



THE HONORABLE ROBERT M. LEVY
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK